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November 16, 1992

ORIGINAL
FILE

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(301) 249-2953

NOV 16 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Petition to Amend FM Table of Allotments
Milton-Freewater, Oregon

Dear Ms. Searcy:

On behalf of Alexandra Communications, licensee of Station KLKY(FM), Milton-Freewater, Oregon, enclosed please find an original and four copies of a petition for rule making to amend the FM Table of Allotments as follows:

- (a) Substitute channel 250C2 for channel 250C3 at Milton-Freewater, Oregon, and
- (b) modify the license of KLKY(FM) to specify operation on channel 250C2 at Milton-Freewater, Oregon.

If any additional information is desired, please communicate with the undersigned.

Respectfully submitted,



Peter W. Lechman
Engineer for KLKY(FM)

PWL:pmc

cc: Thomas Hodgins, KLKY(FM)

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DECLARATION
ENGINEERING STATEMENT

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NOV 16 1992

Prepared For
Alexandra Communications
Station KLKY(FM), Milton-Freewater, Oregon
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Peter W. Lechman says that he is an engineer and President of Lechman & Johnson, Inc., Telecommunications Consultants, with offices located at 16201 Trade Zone Avenue, Suite 106, Upper Marlboro, Maryland, and that his qualifications are a matter of record with the Federal Communications Commission.

That the firm of Lechman & Johnson, Inc. has been retained by Alexandra, licensee of Station KLKY(FM), (formerly KLUB(FM)) Milton-Freewater, Oregon, to prepare this Engineering Statement in support of a Petition For Rule Making to amend the Table of FM Assignments, Section 73.202(b), to allocate Channel 250C2 to Milton-Freewater, Oregon in lieu of Channel 250C3. It is proposed to amend the Table of FM Assignments as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Milton-Freewater, Oregon	250C3	250C2

A channel study was made to determine whether an upgrade could be made on the KLKY(FM) authorized channel which would comply with the Commission's minimum separation requirements of Section 73.207 of the Rules and Regulations. This study showed that Channel 250C2 would meet these separation requirements. The reference coordinates relied upon are as follows:

North Latitude: 45° 59' 04"
West Longitude: 118° 10' 08"

These referenced coordinates are licensed to KNSN(FM), Walla Walla, Washington. The proposed site is considered as an antenna farm since various broadcast facilities are licensed from this mountain site.

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Declaration

Peter W. Lechman

Page Two

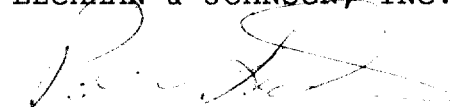
Table I is a list of existing stations, applications, allocations and proposed rulemakings of co-channel and adjacent channel assignments pertinent to allocating Channel 250C2 to Milton-Freewater, Oregon. The tabulation of distances shown in this Table were calculated by the methods prescribed in Section 73.208 of the Commission's Rules and Regulations, using the above reference point.

A Class C2 facility may operate with maximum facilities of 50 kW ERP and antenna HAAT of 150 meters. With these facilities, the predicted distance to the 70 dBu (principal community) contour will extend to a distance of 32.6 kilometers. Section 73.315(a) of the FCC Rules and Regulations requires that the 70 dBu contour must encompass the boundaries of the principal community to be served. The reference coordinates of Milton-Freewater are 45-56-06 N/118-23-12 W, which is located 11 km from the proposed site. There is no terrain obstruction to the city of Milton-Freewater. Therefore, the proposed operation will provide the requisite coverage to Milton-Freewater, Oregon in accordance with the provisions of Section 73.315(a) of the FCC Rules And Regulations.

The results of these studies show that Channel 250C2 can be assigned to KLKY(FM), Milton-Freewater, Oregon consistent with the requirements of the Commission's Rules and Regulations.

I declare under penalty of perjury that the foregoing is true and correct.

LECHMAN & JOHNSON, INC.



Peter W. Lechman
Telecommunications Consultant
November 16, 1992

LECHMAN & JOHNSON, INC.

TABLE I

SEPARATION STUDY

Prepared For
Alexandra Communications
KLKY(FM), Milton-Freewater, Oregon

Channel 250C2 045-59- 4 / 118-10- 8 erp : 50.000 kw eah : 150 m

Designation =====	Channel (MHz) =====	Pertinent Allocation or Authorized Station =====	Separation Actual =====	(Km) Required =====
Co-channel	250C3 (97.9)	KLUB, Milton-Freew, OR BMPH-910828IF 045-54-22 / 118-37-25 5.10 kw / 215 m bearing from proposed = 256.25 deg	36.32	177 <u>1</u> / SHORT (-140.68 km)
1st Adjacent	251C (98.1)	KISC, Spokane, WA BLH-6883 047-34-53 / 117-17-47 94.00 kw / 619 m bearing from proposed = 20.20 deg	189.62	188 CLEAR (1.62 km)
2nd Adjacent	252A (98.3)	Pasco, WA WINDOW OPEN, 046- 8-48 / 119- 5-59 0.00 kw / 0 m bearing from proposed = 284.43 deg	74.25	55 CLEAR (19.25 km)
2nd Adjacent	252A (98.3)	KEYW, Pasco, WA BLH-860701KA 046- 8-48 / 119- 5-59 3.00 kw / 60 m bearing from proposed = 284.43 deg	74.25	55 CLEAR (19.25 km)
2nd Adjacent	252A (98.3)	KUBQ, La Grande, OR BLH-7657 045-19-45 / 118- 4- 0 1.30 kw / -128 m bearing from proposed = 173.74 deg	73.26	55 CLEAR (18.26 km)

SEPARATION STUDY

Prepared For
 Alexandra Communications
 KLKY(FM), Milton-Freewater, Oregon

Channel 250C2 045-59- 4 / 118-10- 8 erp : 50.000 kw eah : 150 m

Designation	Channel (MHz)	Pertinent Allocation or Authorized Station	Separation (Km) Actual Required
=====	=====	=====	=====
2nd Adjacent	248 (97.5)	<u>2</u> /	
3rd Adjacent	253 (98.5)	<u>2</u> /	
3rd Adjacent	247 (97.3)	<u>2</u> /	

END OF STUDY

- 1/ This facility, KLKY(FM) (formerly KLUB), is licensed and this instant proposal will upgrade the channel to Class C2 status.
- 2/ No station close enough for consideration.